

IN THE UNITED STATES DISTRICT COURT

AUG 11 2020

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**TIMOTHY CHISCHILLY and
STACEY YELLOWHORSE,**

Defendants.

MITCHELL R. ELFERS
CLERK

CRIMINAL NO. 20-1566 KWR

Count 1: 18 U.S.C. §§ 1153 and 1111:

First Degree Murder; 18 U.S.C. § 2:

Aiding and Abetting;

Count 2: 18 U.S.C. § 3: Accessory After
the Fact.

INDICTMENT

The Grand Jury charges:

Count 1

On or about January 23, 2020, in Indian Country, in McKinley County, in the District of New Mexico, the defendants, **TIMOTHY CHISCHILLY** and **STACEY YELLOWHORSE**, both Indians, unlawfully killed Jane Doe with malice aforethought, in that the defendants killed Jane Doe willfully, deliberately, maliciously, and with premeditation, by nailing Jane Doe to the floor, hammering a nail into Jane Doe's head, and bludgeoning Jane Doe with a sledgehammer.

In violation of 18 U.S.C. §§ 1153, 1111, and 2.

Count 2

Between on or about January 24, 2020 and on or about February 1, 2020, in McKinley County, in the District of New Mexico, the defendant, **STACEY YELLOWHORSE** knowing that an offense against the United States had been committed, to wit, the murder of Jane Doe, did relieve, comfort, and assist the offender, Timothy Chischilly, in order to hinder and prevent the offender's apprehension, trial, and punishment.

In violation of 18 U.S.C. § 3.

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY


Assistant United States Attorney